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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

ESTHER GARCIA,)	Case No.: 1:23-cv-01593-JLT-BAM
)	
Plaintiff,)	STIPULATION FOR AN EXTENSION OF
)	TIME; PROPOSED ORDER
vs.)	
)	
COMMISSIONER OF SOCIAL SECURITY,)	
)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's motion for summary judgment be extended twenty-five (25) days from May 13, 2024, up to and including June 7, 2024. This is the parties' second stipulation for an extension of the Court's Scheduling Order, and Defendant's first extension.

This is Defendant's first request for an extension, and it is made with good cause. This case was recently reassigned to undersigned counsel for Defendant, along with two other briefs, all of which are due when undersigned counsel for Defendant is on pre-scheduled leave. Thus,

1 Defendant requires an extension in this case, and may require extensions in other cases, and
2 requests this extension in good faith and with no intent to delay these proceedings unnecessarily.

3 The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.

5
6 Respectfully submitted,

7 Dated: April 19, 2024

/s/ Jonathan Omar Pena*

JONATHAN OMAR PENA

Attorney for Plaintiff

**as authorized via e-mail on April 19, 2024*

10
11 Dated: April 19, 2024

PHILLIP TALBERT

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15 By: /s/ Mary Tsai

MARY TSAI

Special Assistant U.S. Attorney

Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including June 7, 2024, to respond to Plaintiff's motion for summary judgment.

IT IS SO ORDERED.

Dated: April 22, 2024

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE